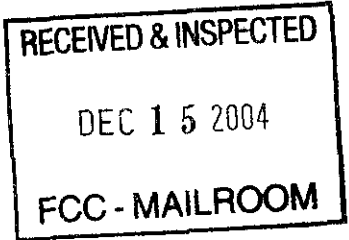


Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554



In the Matter of)

Amendment of Section 73.202(b),)

Table of Allotments,)

FM Broadcast Stations)

Naples, Florida and Sanibel, Florida)

MB Docket No. _____

RM _____

To: Chief, Audio Division
Media Bureau

DOCKET FILE COPY ORIGINAL

PETITION FOR RULE MAKING

Meridian Broadcasting Inc. ("Petitioner"), licensee of Station WTLT(FM), Naples, Florida proposes to amend the Commission's FM Table of Allotments to change the channel and community of license of Station WTLT(FM) from Channel 229 C3, Naples, Florida to Channel 229C2, Sanibel, Florida. This change will upgrade the facilities of Station WTLT(FM) and provide a first local transmission service to Sanibel, Florida.

Petitioner desires to change the community of license for Station WTLT under the guidelines set forth in Amendment of the Commission's Rules Regarding Modification of FM and TV Authorizations to Specify a New Community of License, 4 FCC Rcd 4870 (1989), recons. granted in part, 5 FCC Rcd 7094 (1990). The proposed use of Channel 229 C2 at Sanibel is mutually exclusive with the current use of Channel 229C3 at Naples.¹ Moreover, Sanibel (pop. 6064 - 2000 U.S. Census) is preferred under the allotment priorities for a first local service (Priority 3). Since Naples will continue to have a local service under this scenario, the proper comparison is the retention of 7 stations in Naples (Priority 4) versus a first local service at

¹ See Engineering Exhibit appended hereto as Exhibit 1.

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Sanibel (Priority 3). Furthermore, Sanibel will end up with a higher class channel (Channel 229C2 instead of WTLT's current channel (Channel 229C3) under the instant proposal. This will result in a net gain of service to 128,205 persons and 4198 square kilometers, a 25% increase in population and a 96% increase in area served. See Revision of FM Assignment Policies and Procedures, 90 FCC 2d 88 (1982), recons. denied 56 RR 2d 448 (1984).

COMMUNITY OF LICENSE

Sanibel fully satisfies the definition of a community for allotment purposes. It is located within the Capel Coral, Florida Urbanized Area. Therefore, a Tuck² showing is provided.

The Commission considers eight factors in assessing the independence of a specified community: (1) the extent to which the community residents work in the larger metropolitan area, rather than the specified community; (2) whether the smaller community has its own newspaper or other media that covers the community's local needs and interests; (3) whether community leaders and residents perceive the specified community as being an integral part of, or separate from, the larger metropolitan area; (4) whether the specified community has its own local government and elected officials (5) whether the smaller community has its own telephone book provided by the local telephone company or zip code; (6) whether the community has its own commercial establishments, health facilities, and transportation systems; (7) the extent which the specified community and the central city are part of the same advertising market; and (8) the extent to which the specified community relies on the larger metropolitan area for various municipal services such as police, fire protection, schools, and libraries. Tuck, supra. All eight factors need not favor the applicant; however, if a majority of the factors demonstrate that the

²

Faye and Richard Tuck, 3 FCC Rcd 5374, 5378 (1988).

specified community is distinct from the urbanized area, the Commission will treat it as an independent community. Id. Parker and Port St. Joe, Florida, 11 FCC Rcd 1095, ¶¶ 9-11 (1996) (finding that the proposed community was independent, although it lacked its own telephone directory and local newspaper, and was included in the urbanized area's market by Arbitron); accord Jupiter and Hobe Sound, Florida, 12 FCC Rcd 3570, ¶ 3 (1997) (citing Parker and Port St. Joe, Florida).

In this case the evidence presented, evaluated in light of Commission precedent in other change of community allocation proceedings, abundantly supports a finding that Sanibel is sufficiently independent from the Cape Coral, Florida Urbanized Area to merit its own FM allotment:

(1) *Extent to Which the Residents of Sanibel Work in Sanibel.*

Sanibel's demographic profile is substantially different from that of surrounding Lee County, Florida and this is reflected in its labor force. Thirty eight percent of Sanibel's residents 16 years and older are in the labor force, as opposed to fifty three percent of Lee County's residents 16 years and older. Thirteen percent of Sanibel's working residents work at home compared to three and one half percent of Lee County's working residents. Three and seven tenths percent of Sanibel's working residents walk to work as compared to one and one half percent of Lee County's working residents. The mean commuting time for Sanibel residents is eighteen minutes compared to twenty five minutes for Lee County residents. It is safe to conclude that, on average, Sanibel residents work closer to home than other Lee County residents and that a substantial number of Sanibel residents (over 16%) work in their homes or

within walking distance of their homes.³

(2) *Newspapers and Other Media.*

Residents of Sanibel are served by several local newspapers. The Island Sun newspaper (circulation 12,000) and Sanibel Captiva Islander newspaper (circulation 9800) both published weekly. Additionally, local businesses advertise in the Sanibel-Captiva Shoppers Guide (circulation 11,000) which is another weekly publication published in Sanibel.⁴

(3) *Community Leaders and Residents Perceive Themselves as Separate From the Cape Coral Urbanized Area.*

Sanibel has its own unique identity and a history that is separate from that of the Cape Coral urbanized area. Sanibel is a barrier island located in the Gulf of Mexico roughly 3 miles from the Florida mainland. It is 12 miles long and 5 miles wide at its widest point.⁵ Much of the northern portion of Sanibel is a natural preserve, the J.N. Ding Darling National Wildlife Refuge.

Sanibel was occupied by the Calusa Indians at the time of Florida's Spanish colonization. It's occupation by Americans occurred in the 1830's but early attempts at settling the island failed. In the 1880's the United States established a lighthouse on the island and Sanibel has been permanently occupied from that time to the present.

Until 1963 Sanibel could only be reached by boat. That year, a causeway opened linking Sanibel to the Lee County, Florida mainland. In the 1960's developers and Lee County officials

³ See US Census materials appended hereto as Exhibit 2.

⁴ See directory listing appended hereto as Exhibit 3.

⁵ See map appended hereto as Exhibit 4.

envisioned Sanibel as a new “Miami Beach.” This alarmed the island’s residents, who wanted to maintained a more nature-friendly lifestyle. In 1975 Sanibel’s residents incorporated the City of Sanibel to better control local land use.⁶ To this end, the City of Sanibel has adopted a Sanibel Plan setting out its vision of Sanibel as a small town community in harmony with nature.⁷ As previously noted, Sanibel is demographically distinct from surrounding Lee County, Florida. Its population is older (60.5 years median age as compared to 45.2 years), better educated (54.9% aged 25 or greater with a bachelor’s degree versus 21.1 percent for the County), wealthier (per capita income of \$66,912 versus \$24,542 for the County) and less diverse (98 percent white versus 87.7 percent for the County).⁸

Rising property prices on the island have made it difficult for persons of modest means to find housing in Sanibel. To address this problem, the City of Sanibel initiated a Below Market Rate Housing program in 1983 to provide housing for persons working on the island. Currently, there are 50 housing units constructed and 12 under development in the BMRH program. The City expects to have 95 BMRH units constructed by the year 2017.⁹

(4) Sanibel Has Its Own Local Government and Elected Officials.

Sanibel was incorporated as a city in 1974. It has a City Council/Manager form of government. The City Council is comprised of five members elected at large. The members of the City Council elect a Mayor and Vice-Mayor from among their members. The City Council

⁶ See selected pages from Sanibel and Captiva Florida’s Gulf Coast Island Paradise (Sanibel and Captiva Islands Chamber of Commerce 2004) appended hereto as Exhibit 5.

⁷ See Vision Statement and Table of Contents to Sanibel Plan, appended hereto as Exhibit 6.

⁸ See Exhibit 2.

⁹ See Below Market Rate Housing brochure appended hereto as Exhibit 7.

is vested with all legislative powers of the city. It appoints the City Manager who is the Chief Administration Officer of the city.¹⁰

The various Sanibel City offices and departments include the Building Department, the City Clerk's Office; the City Manager's Office, the City Attorney's Office, the City Council, the Finance Department, the Natural Resources Department, the Parks and Recreation Department, the Planning Department, the Police Department, the Public Works Department and the Utilities Department. The city communicates with its citizens through its web site, www.mysanibel.com.¹¹

The City of Sanibel has an annual budget of \$34,766,925 (FY2003/04) and employs 123 full-time employees. The City's boundaries include 7,451 acres of conservation lands, 810 acres of which are administered by the city. While Sanibel has a 2000 census population of 6,064, its seasonal peak population in 2000 was 33,000. In the year 2000, Sanibel Causeway traffic totaled 3,433,769 vehicles.¹²

Land use in Sanibel is regulated by the City's Planning Department and its Building Department. Sanibel's Parks and Recreation Department oversees the local gym, pool, ball fields, and the city's Historical Museum. It also administers a very active Seniors Program. Law enforcement and traffic control in Sanibel is the responsibility of the City Police Department. The Public Works Department maintains the City Garage, parks, City Hall and city roads. Public Works is also responsible for traffic engineering and litter control in Sanibel.

¹⁰ See Sanibel City Charter appended hereto as Exhibit 8.

¹¹ See City of Sanibel Home Page at www.MySanibel.com.

¹² See City of Sanibel Florida Facts and Figures appended hereto as Exhibit 9.

Local sewer services are provided by the City Utility Department.¹³

Fire protection in Sanibel is provided through the Sanibel Fire Control District, an elected body separate from Sanibel City government. Sanibel School, the local elementary school, is administered by the School Board of Lee County, Florida. Water service is provided to Sanibel by a private company located in Sanibel, the Island Water Association. Electricity is provided to the City of Sanibel by the Lee County Electric Co-op. The Sanibel Public Library is not a governmental agency, but is a not-for-profit corporation.

(5) *Sanibel Has its Own Zip Code and Telephone Directory separate from Lee County.*

The City of Sanibel has a local U.S. Post Office and its own zip code, 33957. The local phone company publishes a separate telephone directory for Sanibel-Captiva Islands & Fort Myers Beach¹⁴ City of Sanibel government listings are also found in the Government Offices section of the Lee County telephone directory.¹⁵

(6) *Sanibel Has Numerous Commercial Establishments and Its Own Health Facilities.*

There are numerous businesses located within Sanibel. The Yahoo telephone listings for Sanibel business include 183 businesses with Sanibel addresses. Among these businesses are three accountants, an advertising agency, architects, contractors, five banks, the local (Sanibel-Captiva) Chamber of Commerce, three computer companies, innumerable real estate agents, a

¹³ See City of Sanibel web page at www.MySanibel.com/sanphon.htm (12/10/2004) appended hereto as Exhibit 10.

¹⁴ See Exhibit 11.

¹⁵ See Exhibit 12.

movie theater, a community theater, three newspapers, print shops, a veterinary clinic with six veterinarians, and three video production companies. Yahoo telephone listings identify nine lawyers within the Sanibel City limits. There are also five churches of varying denominations listed and several (more than 4) non-chain grocery/food stores.¹⁶

A number of health care providers are also located in Sanibel. Medical services are available from nine local medical doctors, some of whom practice with the following groups: Lee Convenient Care, Sanibel Medical Clinic, and Eye Centers of Florida. Additionally, there are listings within the City of Sanibel for two dentists, two optometrists, a podiatrist and three chiropractors.¹⁷

A full range of parks and recreation services are available to the residents of Sanibel including, ball fields, a community swimming pool, the Sanibel Historical Museum and Seniors Program administered by the Parks and Recreation Department.¹⁸ Sanibel, itself, has numerous public beaches including beaches at Blind Pass, Bowmans, Tarpon Bay, Nerita, Beach, Fulgar, Donax, Dixie Beach, Bailey Road, the Causeway and Lighthouse.¹⁹ The residents of Sanibel have easy access to the J.N. Ding Darling National Wild life Refuge's visitor center, hiking trails, canoe rentals and guided tours.²⁰

Community activities in Sanibel include the Sanibel Music Festival which presents seven

¹⁶ See Exhibit 13.

¹⁷ See Exhibit 14.

¹⁸ See Recreation Department in Exhibit 10. See also, Sanibel Historical Village I Museum literature appended hereto as Exhibit 15.

¹⁹ See Table of All the Beaches appended hereto as Exhibit 16.

²⁰ See webpages from <http://ding.darling.fws.gov> appended hereto as Exhibit 17.

classical music concerts each March; the Old School House Theater, a 160 seat live theater; and Ding Darling Days, a week-long celebration of nature at J.N. Ding Darlin National Wildlife Refuge..²¹

Sanibel is also home to a number of religious organizations, such as Sanibel Community Church, Sanibel Congregational United Church, St. Michael and All Angels Episcopal Church, First Church of Christ Scientist and St. Isabel Catholic Church.

(7) *Extent to which the community and the central city are part of the same advertising market.*

Lee and Collier Counties, Florida comprise the Fort Myers - Naples - Marco Island Arbitron Metro Market.²² This media market extends beyond the Cape Coral Urbanized Area. Nevertheless, business in Sanibel may advertise in local media, such as the Island Sun Newspaper and the Sanibel Captiva Islander which enable them to reach the residents of Sanibel. Residents may also access then City's webpage to learn about community news and events. Thus, the residents of Sanibel do not need to travel to Lee County or seek out other media sources in order to find out what is happening in their community.

(8) *Sanibel Has a School System Associated with Lee County, but its Police and Fire Protection are Provided Independently of other jurisdictions.*

The city's education system is provided through Lee County which consists of the Sanibel School with a total enrollment of 439 students in grades K-8. See Exhibit 9.

As previously noted, Sanibel provides many municipal services to its residents including police,

²¹ See Exhibits 5, 17 and 18.

²² See Fort Myers - Naples - Marco Island, FL Market Overview from Investing In Radio 2004 3rd Edition (BIA Financial Network 2004) appended hereto as Exhibit 19.

sewer, sanitation, roads, parks and recreation. Fire protection is from an independent fire control district.

CONCLUSION

Sanibel is a city separate and distinct from the other communities in the Cape Coral Urbanized Area. The year 2000 census population, 6064, compares favorably with the population size of other radio stations' communities of license within the Cape Coral Urbanized Area.²³ Sanibel provides city services comparable to those of other smaller cities. Sanibel's citizens are distinct demographically and share a common interest in preserving the unique small town character of their island community. Sanibel will benefit from the local transmission service proposed by Petitioner and the arrangement of FM allotments proposed herein fully satisfies the requirements of Section 307(b) of the Communications Act of 1934, as amended.

Respectfully submitted,



Joseph A. Belisle
Counsel for Meridian Broadcasting Inc.

December 14, 2004

Leibowitz & Associates, P.A.
One SE Third Avenue - Suite 1450
Miami, FL 33131
(305) 530-1322

²³ Estero, population 9503, is served by Station WRQC. Fort Myers Beach, population 6561, is served by Station WJBX. Fort Myers Villas, population, is served by WJPT. Pine Island Center, population 1,721 is served by Station WPTK. Tice, population 4,538, is served by Station WJGO. The population figure for Fort Myers Villas, which is not a census designated place, is from the Rand McNally Commercial Atlas and Marketing Guide 2003.

EXHIBIT 1

JOHN J. MULLANEY
JOHN H. MULLANEY, P.E. (1994)
ALAN E. GEARING, P.E.
TIMOTHY Z. SAWYER

301 921-0115 Voice
301 590-9757 Fax
Mullaney@MulEngr.com

MULLANEY ENGINEERING, INC.

9049 SHADY GROVE COURT
GAITHERSBURG, MD 20877

ENGINEERING EXHIBIT EE-RM:

**RULE MAKING TO AMEND
FM TABLE OF ALLOTMENTS**

**DELETE CH. 229C3 AT NAPLES, FL
ALLOT CH. 229C2 TO SANIBEL, FL**

NOVEMBER 19, 2004

**ENGINEERING STATEMENT PREPARED ON BEHALF OF
MERIDIAN BROADCASTING, INC.
LICENSEE OF WTLT (FM)
CHANNEL 229C3 - NAPLES, FLORIDA**

Facility ID: 66223



ENGINEERING EXHIBIT EE-RM:

**RULE MAKING TO AMEND
FM TABLE OF ALLOTMENTS**

**DELETE CH. 229C3 AT NAPLES, FL
ALLOT CH. 229C2 TO SANIBEL, FL**

TABLE OF CONTENTS:

1. Declaration of Engineer
2. Narrative Statement
3. Figure 1, Channel Allocation Study for Ch. 229C2.
From Special Ref. Point for Sanibel, FL
4. Figure 2, General Area Map.
5. Figure 3, Gain/Loss Coverage Map.
6. Figure 4, Other FM Services.

Declaration

I, John J. Mullaney, declare and state that I am a graduate electrical engineer with a B.E.E. and my qualifications are known to the Federal Communications Commission, and that I am an principal engineer in the firm of Mullaney Engineering, Inc., and that I have provided engineering services in the area of telecommunications since 1977. My qualifications as an expert in radio engineering are a matter of record with the Federal Communications Commission.

The firm of Mullaney Engineering, Inc., has been requested by Meridian Broadcasting, Inc., to prepare the instant engineering exhibit in support of a rule making petition to amend the FM Table of Allotments.

All facts contained herein are true of my own knowledge except where stated to be on information or belief, and as to those facts, I believe them to be true. I declare under penalty of perjury that the foregoing is true and correct.

/s/ John J. Mullaney

John J. Mullaney, Consulting Engineer

Executed on the 19th day of November 2004

ENGINEERING EXHIBIT EE-RM:

**RULE MAKING TO AMEND
FM TABLE OF ALLOTMENTS**

**DELETE CH. 229C3 AT NAPLES, FL
ALLOT CH. 229C2 TO SANIBEL, FL**

NARRATIVE STATEMENT:

This engineering statement has been prepared on behalf of Meridian Broadcasting, Inc., licensee of Radio Station WTLT(FM), at Naples, Florida. The purpose of this statement is to provide engineering in support of a rule making petition to amend the FM Table of Allotments to delete Ch. 229C3 at Naples and re-allot Ch. 229C2 to Sanibel, FL, and to modify the license of WTLT accordingly.

The city of Naples (Collier County) will continue to be served by six aural services (1-AM, 2-FM-Edu & 2-FM-Commercial) and grant of this proposal will result in the **first aural service** to Sanibel, FL (Lee County). The city of Sanibel is part of the Cape Coral Urbanized Area.

WTLT wishes to point out that the upgrade it seeks is on its existing channel with a proposed location which is less than the separation specified by Section 73.207 and, therefore, it is not necessary to demonstrate the availability of an additional equivalent channel in accordance with Section 1.420(g) of the rules.

The proposed reference point is not within 290 kilometers (180 miles) of a United States Border and, therefore, foreign concurrence is not required.

Proposed Reference Site

For the purposes of this rule making the applicant proposes to use a special reference site on Pine Island since zoning is more favorable to towers than it is on Sanibel Island.

N. Latitude:	26°	30'	00"	NAD-27
W. Longitude:	82°	05'	00"	

The proposed special reference site will provide an unobstructed view of the city of license, Sanibel and is located close enough (8 km southeast) to serve the entire community with the required 3.16 mV/M or 70 dBu contour. **Figure 2** is a general area map showing that the entire island of Sanibel is within 12 km of the special reference point (easily served by a C2 facility). It also shows that the 32 km C2 reference city grade circle encompasses more than 50% of the **Cape Coral Urbanized Area (UA)**.

Channel Allocation Study

Figure 1 is a Channel Allocation Study from the special reference point for Sanibel, Florida. The study indicates the actual & required separation in kilometers to all licenses, construction permits, applications, vacant allocations and pending rule makings. From this study it can be determined that proposed reference point exceeds all of these minimum separations.

The licensed site of WTLT is located 35.9 km (22.3 miles) away whereas the required co-channel separation is 177 m (110 miles). Therefore, the proposed substitution is in accordance with Section 1.420(g) and is not required to demonstrate the availability of an additional equivalent channel.

Public Interest Showing

WTLT presently operates as a C3 reduced 73.215 facility with 21 kW at 100 meters HAAT. The proposed change in community & upgrade to maximum Class C2 facilities will permit WTLT to serve a wider area and more population. WTLT presently provides a 60 dBu service to 511,830 persons and 4,369 square kilometers. WTLT anticipates construction of a maximum Class C2 facility which will potentially provide 60 dBu service to 640,035 persons and 8,567 square kilometers (2000 Census). **This represents a 25% increase in population and a 96% increase in area.**

Figure 3 is a map depicting the gain & loss population and area. The gain area consists of 205,590 persons and 5,507 sq.km. The loss area consists of 77,385 persons and 1,309 sq.km.

Figure 4 is a map depicting the other 60 dBu FM services in the area (AMs were not considered at this time). All of the WTLT LIC and RM area is served by at least 5 other services.

The city of Sanibel is located in Lee County and has a population of 6,064 persons (2000 Census). The allotment of Channel 229C2 will be the **first aural service** licensed to this community. The city of Naples will continue to

have one licensed AM and five licensed FM facilities upon grant of this RM petition (six aural facilities).

Based upon the above information, WTLT believes that its request results in a preferential arrangement of allotments and therefore, serves the public interest.

Summary

Meridian Broadcasting, Inc., licensee of Radio Station WTLT, at Naples, Florida requests that the FM Table of Allotments be amended to delete Ch. 229C3 at Naples and re-allot Ch. 229C2 to Sanibel, FL, and to modify the license of WTLT accordingly. This proposal provides a **first aural service** to city of Sanibel, FL.

WTLT believes that the proposed change in community and upgrade to Class C2 facilities will serve the public interest. If granted, WTLT will quickly file an application for construction permit.

/s/ John J. Mullaney

John J. Mullaney, Consulting Engineer

November 19, 2004.



Meridian Broadcasting WTLT(FM) - Naples to Sanibel, FL

SPECIAL

REFERENCE

26 30 00 N

82 05 00 W

CLASS = C2

Current Spacings

Channel 229 - 93.7 MHz

DISPLAY DATES

DATA 11-13-04

SEARCH 11-16-04

Call	Channel	Location	Dist	Azi	FCC	Margin
CITY	229C2	SANIBEL	FL 8.03	133.7	189.5	City Ref
WTLT	LIC-N 229C3	Naples	FL 35.87	124.6	176.5	Existing Lic
ALLO	RSV 228C3	Belle Glade	FL 123.74	83.4	116.5	7.24
WBGf	RSV 228C3	Belle Glade	FL 123.74	83.4	116.5	7.24
WBGf	RSV 228C3	Belle Glade	FL 123.74	83.4	116.5	7.24
WGYL	LIC 229C2	Vero Beach	FL 207.42	53.4	189.5	17.92
WBGf.A	APP-D 228C3	Belle Glade	FL 136.78	81.0	116.5	20.28
WBGf.A	APP-Z 228C3	Belle Glade	FL 136.78	81.0	116.5	20.28
WLVE.C	CP -D 230C0	Miami Beach	FL 196.32	107.2	175.5	20.82
WLVE	LIC-Z 230C0	Miami Beach	FL 196.37	107.2	175.5	20.87
WSJT	LIC 231C	Lakeland	FL 130.00	358.9	104.5	25.50
WBGf	LIC-N 228A	Belle Glade	FL 141.43	80.1	105.5	35.93
WFLZFM	LIC 227C	Tampa	FL 149.78	353.3	104.5	45.28
RDEL	DEL 229C	Ocala	FL 306.76	0.0	248.5	58.26
WOGK	LIC 229C	Ocala	FL 306.76	0.0	248.5	58.26
WOGK.A	APP 229C	Ocala	FL 306.76	0.0	248.5	58.26
RADD	ADD 229C0	Ocala	FL 306.76	0.0	238.5	68.26

Proposed Special Reference Point is MX with Existing License

CHANNEL STUDY - 229C2 - SANIBEL, FL SPECIAL REF

MERIDIAN BROADCASTING, INC.
RULEMAKING PROPOSAL
WTLT(FM) - NAPLES to SANIBEL, FLORIDA

MULLANEY ENGINEERING, INC.
GAITHERSBURG, MARYLAND

FIGURE 1
NOVEMBER 2004

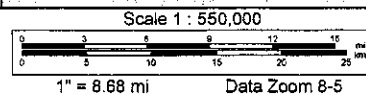
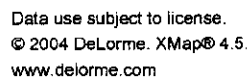


FIGURE 3 - GAIN / LOSS COVERAGE

WTLT(FM) RM Allot 229C2 to Sanibel, FL

Hypo-C2-Max
Sanibel RM FL

Latitude: 26-30-00 N
Longitude: 082-05-00 W
ERP: 50.00 kW
Channel: 228 C2
Frequency: 93.5 MHz
AMSL Height: 150.31 m
Elevation: 0.22 m
Horiz. Pattern: Omni
Vert. Pattern: No

WTLT
Naples FL
BLH20030407AAL
Latitude: 26-19-00 N
Longitude: 081-47-13 W
ERP: 21.00 kW
Channel: 229 C3
Frequency: 93.7 MHz
AMSL Height: 100.0 m
Elevation: 4.0 m
Horiz. Pattern: Omni
Vert. Pattern: No



Mullaney
Engineering, Inc.

November 2004

Gain

Loss

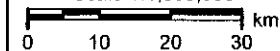
60 dBu Population & Area

	Persons	sq.km
LIC-C3	511,830	4,369
RM-C2	640,035	8,567

Gain	205,590	5,507
Loss	77,385	1,309

2000 Census

Scale 1:1,000,000



Scale 1:1,000,000



FIGURE 4 OTHER FM SERVICES

WTLT(FM) RM Allot 229C2 to Sanibel, FL

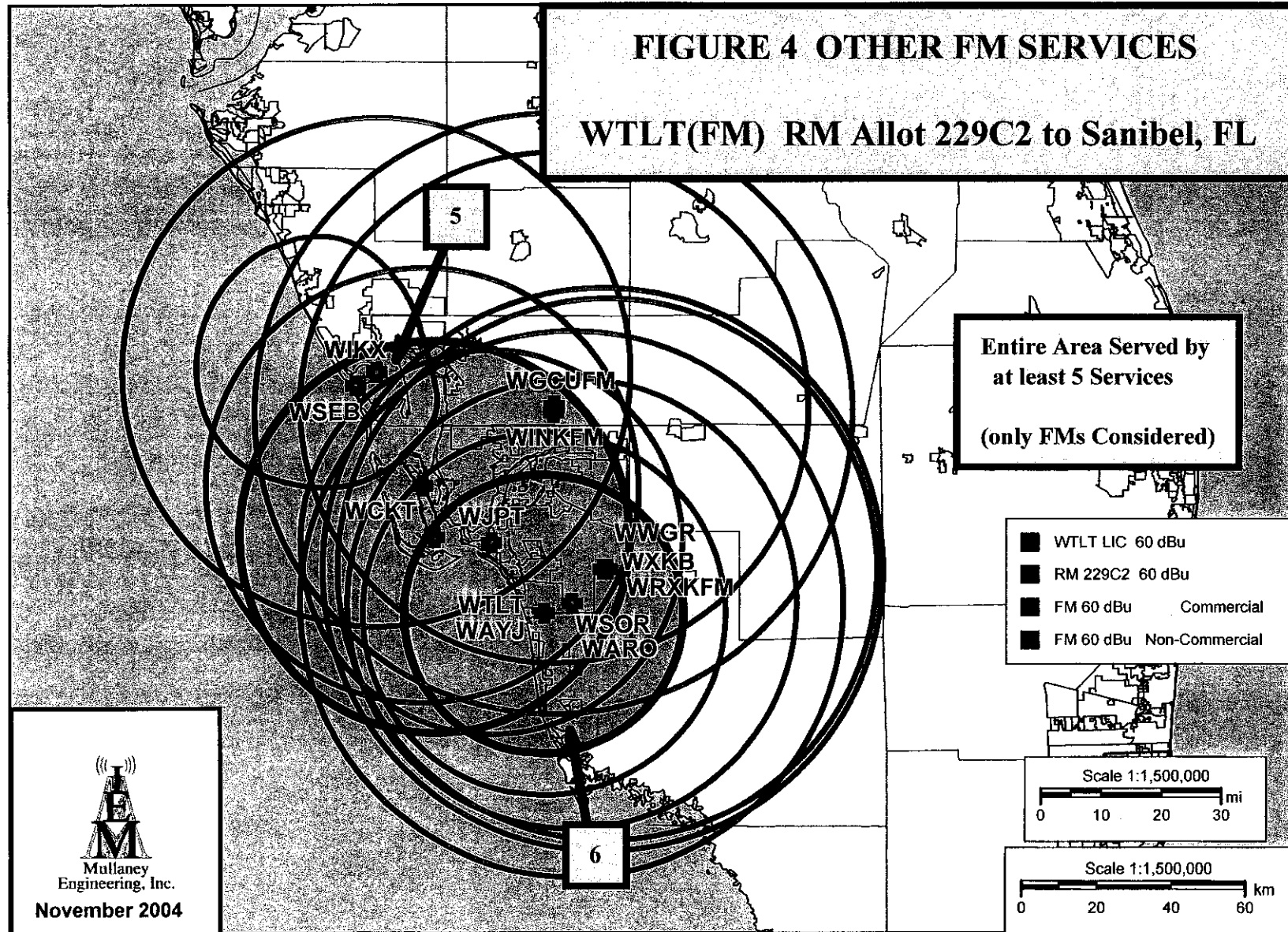


EXHIBIT 2



U.S. Census Bureau

American FactFinder

FACT SHEET

Sanibel city, Florida

Highlights from the Census 2000 Demographic Profiles:

General Characteristics - show more >>

	Number	Percent	U.S.		
Total population	6,064	100.0	100%	map	brief
Male	2,883	47.5	49.1%	map	brief
Female	3,181	52.5	50.9%	map	brief
Median age (years)	60.5	(X)	35.3	map	brief
Under 5 years	115	1.9	6.8%	map	
18 years and over	5,454	89.9	74.3%		
65 years and over	2,427	40.0	12.4%	map	brief
One race	6,034	99.5	97.6%		
White	5,942	98.0	75.1%	map	brief
Black or African American	57	0.9	12.3%	map	brief
American Indian and Alaska Native	5	0.1	0.9%	map	brief
Asian	20	0.3	3.6%	map	brief
Native Hawaiian and Other Pacific Islander	3	0.0	0.1%	map	brief
Some other race	7	0.1	5.5%	map	
Two or more races	30	0.5	2.4%	map	brief
Hispanic or Latino (of any race)	84	1.4	12.5%	map	brief
Average household size	1.99	(X)	2.59	map	brief
Average family size	2.33	(X)	3.14	map	
Total housing units	7,075	100.0	100.0%	map	
Occupied housing units	3,049	43.1	91.0%		brief
Owner-occupied housing units	2,637	86.5	66.2%	map	
Renter-occupied housing units	412	13.5	33.8%	map	brief
Vacant housing units	4,026	56.9	9.0%	map	

Social Characteristics - show more >>

	Number	Percent	U.S.		
Population 25 years and over	5,316	100.0			
High school graduate or higher	5,105	96.0	80.4%	map	brief
Bachelor's degree or higher	2,919	54.9	24.4%	map	
Civilian veterans (civilian population 18 years and over)	1,355	25.0	12.7%	map	brief
Disability status (population 21 to 64 years)	436	14.5	19.2%	map	brief
Foreign born	445	7.4	11.1%	map	brief
Now married (population 15 years and over)	4,063	73.6	54.4%		brief
Speak a language other than English at home (5 years and over)	387	6.5	17.9%	map	brief

Economic Characteristics - show more >>

	Number	Percent	U.S.		
In labor force (population 16 years and over)	2,107	38.5	63.9%		brief
Mean travel time to work in minutes (population 16 years and over)	18.3	(X)	25.5	map	brief
Median household income (dollars)	79,044	(X)	41,994	map	
Median family income (dollars)	92,455	(X)	50,046	map	
Per capita income (dollars)	66,912	(X)	21,587	map	
Families below poverty level	43	2.0	9.2%	map	brief
Individuals below poverty level	195	3.2	12.4%	map	

Housing Characteristics - show more >>

	Number	Percent	U.S.		
Single-family owner-occupied homes	1,927	100.0			brief
Median value (dollars)	392,400	(X)	119,600	map	brief
Median of selected monthly owner costs	(X)	(X)			brief
With a mortgage	1,945	(X)	1,088	map	
Not mortgaged	723	(X)	295		

(X) Not applicable.

Source: U.S. Census Bureau, Summary File 1 (SF 1) and Summary File 3 (SF 3)
